

1 DANIEL G. BOGDEN  
2 United States Attorney  
3 STEVEN W. MYHRE  
4 Assistant United States Attorney  
5 333 Las Vegas Blvd., South, Ste. 5000  
Las Vegas, Nevada 89101  
Tel: (702) 388-6336  
Fax: (702) 388-6296  
5 Attorneys for the United States.

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**  
8

9 UNITED STATES OF AMERICA, }  
10 Plaintiff, } 3:13-cr-00137-JCM-CWH  
11 vs. }  
12 SHAWN P. LAMPMAN, } **STIPULATION AND**  
13 Defendant. } **PROTECTIVE ORDER**

14 The United States, by and through the United States Attorney for the District of Nevada, and  
15 the defendant, Shawn P. LAMPMAN, by and through undersigned counsel, respectfully move for the  
16 entry of a Protective Order governing discovery in this matter in accord with the following Stipulation.  
17

18 **STIPULATION**

19 Whereas, the parties recognize that various federal and state laws and regulations extend  
20 protections and limitations regarding the use, disclosure or publication of information associated with  
21 the privacy and identity of an individual, including, but not limited to, social security number, date of  
22 birth, address, telephone number, driver's license number, financial information, banking information,  
23 and tax information, which is hereinafter collectively referred to as "Protected Personal Information"  
24 ("PPI").

25 Whereas, the parties recognize that discovery in the above-captioned case is likely to be  
26 voluminous and may include documents and other evidence containing PPI of the defendant and/or  
third parties.

1       Whereas, the parties desire to provide for the timely and expeditious exchange of discovery  
2 while simultaneous guarding against the inappropriate use, disclosure, or publication of any PPI  
3 associated with any party or third party.

4       Whereas, in light of the above, the parties have conferred on this matter and have reached  
5 agreement on the exchange and handling of PPI.

6       **IT IS HEREBY STIPULATED AND AGREED** by and between the undersigned parties,  
7 as follows:

8           1.      Documents containing PPI will be referred to as "Protected Documents."  
9           2.      The government may produce Protected Documents to the defendant in discovery  
10 without redacting PPI.

11           3.      Access to Protected Documents produced by the government will be restricted to the  
12 defendant, attorneys for the defendant, and any agents, contractors, or employees acting on behalf of  
13 the defendant and/or his attorneys in connection with the above-captioned matter (hereinafter referred  
14 to collectively as "Authorized Person(s)").

15           4.      Attorneys for the defendant will ensure that all Authorized Persons receive a copy of  
16 this Stipulation and are familiar with its terms and conditions.

17           5.      Unless otherwise Ordered by the Court, an Authorized Person shall not:  
18                  a.     grant or permit access to Protected Documents by any non-Authorized Person.  
19                  b.     allow or permit any non-Authorized Person to read, review, or reproduce any  
20                     Protected Document.  
21                  c.     distribute any Protected Document, by any means, to any non-Authorized  
22                     Person.  
23                  d.     use or disclose Protected Documents, and any PPI contained therein, for any  
24                     purpose other than in connection with the defense of the above-captioned  
25                     matter.

26

1 e. use or disclose a Protected Document in connection with any pleadings or  
2 proceedings in the above-captioned matter without first redacting any PPI,  
3 unless the PPI is directly relevant to the matter at issue.  
4 f. use or disclose PPI in connection with any pleadings or proceedings in the  
5 above-captioned matter, unless the PPI is directly relevant to the matter at  
6 issue.

7 6. Upon conclusion of the above-captioned matter, defendant's attorney shall return any  
8 and all copies of Protected Documents to the attorneys for the United States, or provide them with  
9 written certification that the Protected Documents have been destroyed.

10 7. Nothing in the agreement shall be deemed an admission of the evidentiary admissibility  
11 or inadmissibility of any Protected Document in any subsequent proceeding.

12 WHEREFORE, the undersigned respectfully request that the Court accept and enter this  
13 Stipulation as the Protective Order governing discovery in this case.

14 Respectfully submitted,

15 DANIEL G. BOGDEN  
16 United States Attorney

6/18/2013  
Date

17 STEVEN W. MYHRE  
18 Assistant United States Attorney

6/18/13  
Date

19 M.B.  
20 MARK BAILUS  
21 Counsel for defendant  
SHAWN P. LAMPMAN

22 IT IS SO ORDERED:

23  
24 this 19 day of June 2013.

25  
26   
UNITED STATES MAGISTRATE JUDGE